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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ANIBAL RODRIGUEZ, et al. individually and
on behalf of all others similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 3:20-CV-04688-RS

**GOOGLE’S RULE 6(B) MOTION FOR LEAVE
TO LATE FILE OPPOSITION TO
PLAINTIFFS’ MOTION TO QUASH (ECF
611)**

Date: August 20, 2025
Time: 8:00 a.m.
Dept: 3, 17th Fl.
Judge: Hon. Richard Seeborg

Date Action Filed: July 14, 2020
Trial Date: August 18, 2025

1 Pursuant to Federal Rule of Civil Procedure 6(b), Google LLC respectfully asks the Court
2 for leave to file its opposition to Plaintiffs' Motion to Quash (ECF No. 611) late. The Court set the
3 filing deadline for 5:00 p.m. today, August 19, 2025. Google has good cause for its request:
4 Plaintiffs produced court-ordered documents essential to the opposition just 90 minutes before the
5 deadline.

6 Google's counsel was prepared to timely file the opposition brief, declarations, and exhibits
7 early this afternoon. However, Plaintiffs did not produce Susan Harvey's court-ordered medical
8 records until 3:27 pm today. Receiving these new documents so close to the deadline forced
9 Google's counsel to substantially revise the entire filing. Counsel immediately began reviewing the
10 records and rewriting the brief and declarations to address the new information. Despite working
11 as quickly as possible, Google could not complete this work before the 5:00 p.m. deadline.

12 The Court may extend a deadline after it has expired for good cause and excusable neglect.
13 Fed. R. Civ. P. 6(b)(1)(B). Good cause exists here. The delay is short and will have no impact on
14 the case schedule. The reason for the delay was Plaintiffs' last-minute production of documents, an
15 event outside Google's control. Granting this motion allows the Court to consider a complete record
16 that includes the very documents it ordered Plaintiffs to produce.

17 Google apologizes for any inconvenience to the Court. We respectfully ask the Court to
18 grant this motion and accept our Opposition to Plaintiffs' Motion to Quash as timely filed.
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21 /s/ Simona Agnolucci

22 SIMONA AGNOLUCCI
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